

1 CLEMENTE M. JIMÉNEZ, SBN 207136
2 428 J Street, Suite 355
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4 (916) 443-8055

5 Attorney for Defendant
6 PABLO CASTRO MARRON

7
8
9 IN THE UNITED STATES DISTRICT COURT
10
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

12
13 UNITED STATES OF AMERICA,

14 Case No.: 95-235 EJG

15 Plaintiff,

16 STIPULATION AND ORDER TO RESET
17 BRIEFING SCHEDULE AND HEARING

18 v.
19 PABLO CASTRO MARRON,

20 DATE: February 24, 2012

21 TIME: 10:00 a.m.

22 JUDGE: Hon. Edward J. Garcia

23 Defendant.

24
25 IT IS HEREBY STIPULATED by and between Assistant United States Attorneys
26 William Wong and Todd Pickles, Counsel for Plaintiff, and Attorney Clemente M.
27 Jiménez, Counsel for Defendant PABLO CASTRO MARRON, that the presently set
28 briefing schedule and hearing on the defendant's motion to dismiss the indictment be
modified as follows:

29 The government's response to the defendant's motion to be filed by February 24,
30 2012; defendant's reply to be filed by March 2, 2012; and the matter set for a non-
31 evidentiary hearing on March 16, 2012, at 10:00 a.m. Based on the outcome of the
32 motion, the parties can select future dates as necessary.

33 The parties' attempts to resolve this matter are ongoing. In the absence of
34 resolution, defense counsel will require time to respond to the government's reply brief.

1 Further, defense counsel will be unavailable for the presently scheduled hearing date due
2 to an out of town professional seminar scheduled on that day.

3 IT IS FURTHER STIPULATED that time for trial under the Speedy Trial Act, 18
4 U.S.C. Section 3161 et seq. be tolled pursuant to Section 3161(h)(7)(A) and (B)(iv),
5 (Local code T-4), and that the ends of justice served in granting the continuance and
6 allowing the defendants further time to prepare outweigh the best interests of the public
7 and the defendant to a speedy trial.

8
9 DATED: February 9, 2012

/S/ William Wong
WILLIAM WONG
Attorney for Plaintiff

/S/ Todd Pickles
TODD PICKLES
Attorney for Plaintiff

/S/ Clemente M. Jiménez
CLEMENTE M. JIMÉNEZ
Attorney for Pablo Castro Marron

17 **O RDER**

18 IT IS SO ORDERED, that the revised law and motion schedule be adopted. The Court
19 finds that time under the Speedy Trial Act shall be excluded through March 16, 2012 in
20 order to afford counsel reasonable time to prepare. Based on the parties' representations,
21 the Court finds that the ends of justice served by granting a continuance outweigh the
22 best interests of the public and the defendants to a speedy trial.

23
24 This 9TH day of February, 2012

25
26 /s/ Edward J. Garcia
United States District Judge

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9 DATED: February 9, 2012

/S/ William Wong
WILLIAM WONG
Attorney for Plaintiff

/S/ Todd Pickles
TODD PICKLES
Attorney for Plaintiff

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CLEMENTE M. JIMÉNEZ
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